

TO: FCC Wireless Telecommunications Bureau  
Via [http://gulfoss2.fcc.gov/prod/ecfs/upload\\_v2.cgi](http://gulfoss2.fcc.gov/prod/ecfs/upload_v2.cgi)

FROM: Donald L. Collinson  
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SUBJECT: Comments re RM-10413

As a licensed Amateur Operator for nearly twenty years and Commercial Operator for over 30 years, I agree wholeheartedly with the Rule Making proposed by the ARRL, RM-10413. My particular interest is in the changes to HF operating allocations. While I hold an Amateur Extra license and have had the benefit of full HF privileges, I see benefits to nearly all classes of license holders.

The expansion of phone privileges on 40M will allow contacts with stations in other ITU Regions whose operations are limited to frequencies below 7.15 MHz without resorting to split frequency operation. While split operations are fairly simple using modern equipment, not all amateurs have that equipment available. Split operations have also often led to problems with unintentional interference caused by "split" operator who have inadvertently neglected to check their transmit frequency for ongoing simplex contacts. The expansion of phone privileges on 80M will also facilitate more DX activity and more efficiently use the available band space.

The extension of limited CW operation to Novice and Technician operators into the current general portions of the bands will also have benefits. It will also facilitate greater DX opportunities those operators. However, I think the greatest benefit will be that they will be allowed greater contact with the large pool of more experienced operator currently using those portions of the bands.

Those contacts will allow them to sharpen their operating skills and encourage them to advance more quickly to higher classes of license. There may be a number of General, Advanced and Extra Class operators who would argue that mixing lower class operators into "their" portions of the band will crowd that part of the spectrum. I would argue that there is room for everyone, and that their position is contrary to the spirit of Amateur Radio.

I would urge the Bureau to give this Proposed Rule Making every consideration, and to adopt and implement it as soon as possible.